UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

UNITED STATES OF AMERICA)
vs.) No. 21 CR 50064
BRANDON SIMONSON) Magistrate Judge Jensen
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JOINT STATUS REPORT

The parties, by their undersigned attorneys, hereby submit the following joint status report pursuant to the court's May 10, 2022 order:

(a) Status of Reviewing Discovery and Discussing with Defendant:

The United States has continued to disclose discoverable documents and tangible items in its possession pursuant to Federal Rule of Criminal Procedure 16, Local Criminal Rule 16.1 and the Protective Order entered in this case. Defense counsel is in the process of reviewing these materials.

(b) Status of Any Additional Discovery, Reports or Investigations Sought:

The government has reviewed and has almost completed a response to an itemized list of discovery preservation requests submitted by the defendant. The government is also preparing additional discovery which should be tendered to defense no later than July 15, 2022.

(c) Status of any Discussions with the Government that are Underway or Anticipated:

The parties are in the discovery phase and have not engaged in plea negotiations.

(d) Proposed Schedule:

The parties respectfully request an additional 60 days to review materials submitted in discovery. The parties agree that time should be excluded

from July 11, 2022 until to the next scheduled status report or hearing date pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

Respectfully submitted,

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By: /s/ Vincenza Tomlinson

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